

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**UNITED STATES OF AMERICA** §  
§  
vs. § **Case No. 3:18-cr-345-D**  
§  
**ANDREW KASNETZ** §

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL**

**TO THE HONORABLE DISTRICT JUDGE:**

Comes Now Michael J. Todd, as Movant, and respectfully moves the Court for an Order granting his withdrawal from this cause and in support of, would show the Court as follows:

**I.**

This case is currently scheduled for **Trial on Monday, January 25, 2021, at 9:00 a.m.**

**II.**

Undersigned counsel was retained to represent Defendant on or about January 28, 2019. Good cause exists for withdrawal as defendant has failed to comply with the financial terms as previously agreed to. The final deadline for Defendant to satisfy the financial terms was Friday, September 18, 2020.

Defendant's failure to do so reduces the ability of present counsel to provide adequate representation to Defendant and renders an ongoing attorney/client relationship impossible.

This withdrawal is not sought for delay, but that Defendant might be represented by counsel of his choice.

**III.**

On or about September 15, 2020, undersigned counsel spoke with Assistant United States Attorney Shane Read in regards to this motion and the filing of same. On September 16, 2020,

undersigned counsel received an email from Assistant United States Attorney Shane Read, advising the government is not opposed to this motion.

Additionally, on or about September 16, 2020, defendant Andrew Kasnetz advised he is not opposed to this motion.

**WHEREFORE, PREMISES CONSIDERED** Movant prays that the Court will grant this Motion to Withdraw as Counsel on the face of this pleading. Alternatively, Movant requests that the Court set this matter for a hearing so that Movant may present evidence in support of this motion.

Respectfully Submitted,

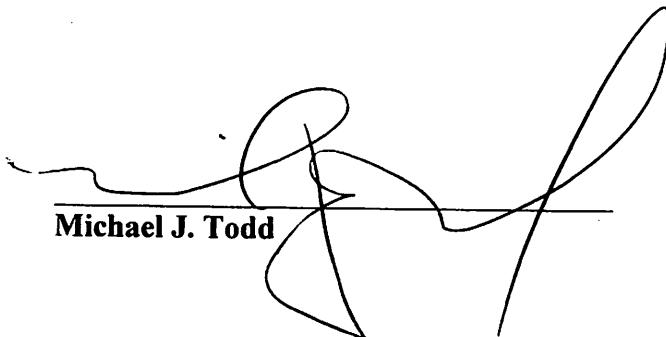
/S/Michael J. Todd

Michael J. Todd  
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**VERIFICATION**

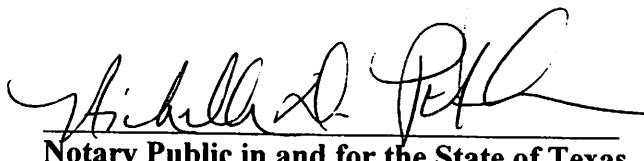
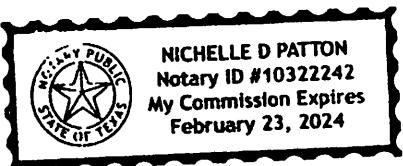
**STATE OF TEXAS §**  
**COUNTY OF DALLAS §**  
    §§

Before me, the undersigned notary, on this day, personally appeared Michael J. Todd, a person whose identity is known to me. After I administered an oath to him, upon his oath, he said he has read the foregoing motion and that the facts stated in it are within his personal knowledge and are true and correct.



Michael J. Todd

**SUBSCRIBED AND SWORN TO BEFORE ME**, the undersigned Notary Public on this  
the 21<sup>st</sup> day of September, 2020.



Nichelle D. Patton

Notary Public in and for the State of Texas

**CERTIFICATE OF CONFERENCE**

I certify that on the 15th day of September 2020, I spoke with Assistant United States Attorney, Shane Read, in regards to this motion and the filing of same, and he advised the government is not opposed.

/s/Michael J. Todd  
**Michael J. Todd**

**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the foregoing document was served upon the United States Attorney's Office and all other opposing counsel, via the Court's ECF system on the 21<sup>st</sup> day of September, 2020.

/s/Michael J. Todd  
**Michael J. Todd**